UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	Hon. F. Dennis Saylor IV
v.	
GOOGLE LLC,	
Defendant.	

DECLARATION OF KEVIN GANNON IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO STRIKE
EXPERT REPORT OF SUNIL KHATRI, PH.D.

I, Kevin Gannon, hereby declare as follows:

1.   I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff,

Singular Computing LLC ("Singular"), in this action. I submit this declaration pursuant to 28

U.S.C. § 1746 in support of Singular's opposition to the motion of defendant, Google LLC

("Google"), to strike portions of the expert report of Sunil Khatri, Ph.D.

2.   Attached hereto as Exhibit A is a true and correct copy of Exhibit A to Singular's

Preliminary Patent-Related Disclosures that was served on counsel for Google on September 4,

2021.

3.   Attached hereto as Exhibit B is a true and correct copy of Exhibit B to Singular's

Preliminary Patent-Related Disclosures that was served on counsel for Google on September 4,

2021.

4.   Attached hereto as Exhibit C is a true and correct copy of Exhibit A

(Supplemental) to Singular's Preliminary Patent-Related Disclosures that was served on counsel

for Google on August 10, 2022.

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5. Attached hereto as Exhibit D is a true and correct copy of Exhibit B (Supplemental) to Singular's Preliminary Patent-Related Disclosures that was served on counsel for Google on August 10, 2022.

6. Attached hereto as Exhibit E is a true and correct copy of an excerpt from the transcript of the hearing in this case before Magistrate Judge Cabell on June 30, 2021.

7. Attached hereto as Exhibit F is a true and correct copy of an email from Brian Seeve to Anant Saraswat *et al.* dated September 8, 2021 and an email from Anant Saraswat to Brian Seeve *et al.* dated September 8, 2021.

8. Set forth below is a copy of an excerpt from pages GOOG-SING-SC-000452-54 of Google's source code production in this case:

9. Set forth below is a copy of an excerpt from page GOOG-SING-SC-000452 of Google's source code production in this case:

Executed at Boston, Massachusetts on February 1, 2023.

/s/ Kevin Gannon